

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SureFunding, LLC,

Debtor.

Chapter 11

Case No. 20-10953 (LSS)

Re: Docket No. 27, 56

**CERTIFICATION OF COUNSEL REGARDING ORDER AUTHORIZING THE
RETENTION AND EMPLOYMENT OF FOX ROTHSCHILD LLP AS COUNSEL FOR
THE DEBTOR EFFECTIVE AS OF THE PETITION DATE**

I, Jeffrey R. Waxman, hereby certify as follows:

1. On April 21, 2020, the above-captioned debtor and debtor-in-possession (the “Debtor”) filed the *Debtor’s Application for Entry of an Order Authorizing the Retention and Employment of Fox Rothschild LLP as Counsel for the Debtor Effective as of the Petition Date* [Docket No. 27] (the “Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. The deadline to object to the Application was May 6, 2020.

3. On May 4, 2020, the Noteholders filed the [Redacted] *Noteholders’ Omnibus Objection to Debtor’s Motions* [Docket No. 56] with the Court.

4. On November 11, 2023, the Debtor noticed the Application to be considered at the hearing for December 14, 2022 [Docket No. 184], and after adjournment, the Application was scheduled to be considered by the Court on February 22, 2022.

5. On February 17, 2023, the Noteholders informed the Debtor that they will not be moving forward with their objection to Fox’s retention.

6. The undersigned counsel is available should the Court have any concerns with respect to the foregoing, however, provided the Court has no questions, the undersigned counsel

respectfully requests that the Court enter the proposed order approving the Application, a copy of which is attached hereto as Exhibit A, at its earliest convenience.

Dated: February 24, 2023

MORRIS JAMES LLP

/s/ Jeffrey R. Waxman

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